

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
HAMMOND DIVISION

UNITED STATES OF AMERICA )

v. )

ROBERT PATRICK COLLINS )

Cause No. **2:18CR 104**

18 U.S.C. §922(a)(6)

18 U.S.C. §924(a)(1)(A)

**INDICTMENT**

**THE GRAND JURY CHARGES:**

**COUNT 1**

On or about March 12, 2018, in the Northern District of Indiana,

**ROBERT PATRICK COLLINS,**

defendant herein, in connection with the acquisition of a firearm, a Smith & Wesson model SD40VE .40 caliber firearm bearing serial number FZS2762, from Westforth Sports, Inc., a federally licensed firearms dealer, knowingly made a false and fictitious statement to Westforth Sports Inc., which statement was intended and likely to deceive Westforth Sports Inc. as to a fact material to the lawfulness of such sale of the firearm to defendant ROBERT PATRICK COLLINS, in that defendant ROBERT PATRICK COLLINS did execute a U.S. Department of Justice, ATF Form 4473 Firearms Transaction Record, to the effect that defendant ROBERT PATRICK COLLINS represented himself as

**FILED**

SEP 19 2018

ROBERT N. TRGOVICH, Clerk  
U.S. DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA

the actual purchaser of the firearm, whereas in truth and in fact, he well knew that he was buying said firearm for another person;

All in violation of Title 18, United States Code, Section 922(a)(6).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 2**

On or about March 12, 2018, in the Northern District of Indiana,  
**ROBERT PATRICK COLLINS,**  
defendant herein, knowingly made a false statement and representation to Westforth Sports Inc., an entity licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Westforth Sports Inc., in that defendant ROBERT PATRICK COLLINS in connection with his acquisition of a firearm from Westforth Sports Inc., did execute a U.S. Department of Justice, ATF Form 4473 Firearms Transaction Record, to the effect that defendant ROBERT PATRICK COLLINS represented himself as the actual buyer of the firearm, when in fact he well knew that he was buying the firearm for another person;

In violation of Title 18, United States Code, Section 924(a)(1)(A).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 3**

On or about March 31, 2018, in the Northern District of Indiana,  
**ROBERT PATRICK COLLINS,**  
defendant herein, in connection with the acquisition of a firearm, a Taurus model PT111G2 9mm firearm bearing serial number TLN26405, from South County Guns, a federally licensed firearms dealer, knowingly made a false and fictitious statement to South County Guns, which statement was intended and likely to deceive South County Guns as to a fact material to the lawfulness of such sale of the firearm to defendant ROBERT PATRICK COLLINS, in that defendant ROBERT PATRICK COLLINS did execute a U.S. Department of Justice, ATF Form 4473 Firearms Transaction Record, to the effect that defendant ROBERT PATRICK COLLINS represented himself as the actual purchaser of the firearm, whereas in truth and in fact, he well knew that he was buying said firearm for another person;

All in violation of Title 18, United States Code, Section 922(a)(6).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 4**

On or about March 31, 2018, in the Northern District of Indiana,  
**ROBERT PATRICK COLLINS,**  
defendant herein, knowingly made a false statement and representation to South County Guns, an entity licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of South County Guns, in that defendant ROBERT PATRICK COLLINS in connection with his acquisition of a firearm from South County Guns, did execute a U.S. Department of Justice, ATF Form 4473 Firearms Transaction Record, to the effect that defendant ROBERT PATRICK COLLINS represented himself as the actual buyer of the firearm, when in fact he well knew that he was buying the firearm for another person;

In violation of Title 18, United States Code, Section 924(a)(1)(A).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 5**

On or about May 7, 2018, in the Northern District of Indiana,

**ROBERT PATRICK COLLINS,**

defendant herein, in connection with the acquisition of a firearm, a Taurus model PT111G2 9mm firearm bearing serial number TLN32021, from South County Guns, a federally licensed firearms dealer, knowingly made a false and fictitious statement to South County Guns, which statement was intended and likely to deceive South County Guns as to a fact material to the lawfulness of such sale of the firearm to defendant ROBERT PATRICK COLLINS, in that defendant ROBERT PATRICK COLLINS did execute a U.S. Department of Justice, ATF Form 4473 Firearms Transaction Record, to the effect that defendant ROBERT PATRICK COLLINS represented himself as the actual purchaser of the firearm, whereas in truth and in fact, he well knew that he was buying said firearm for another person;

All in violation of Title 18, United States Code, Section 922(a)(6).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 6**

On or about May 7, 2018, in the Northern District of Indiana,

**ROBERT PATRICK COLLINS,**

defendant herein, knowingly made a false statement and representation to South County Guns, an entity licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of South County Guns, in that defendant ROBERT PATRICK COLLINS in connection with his acquisition of a firearm from South County Guns, did execute a U.S. Department of Justice, ATF Form 4473 Firearms Transaction Record, to the effect that defendant ROBERT PATRICK COLLINS represented himself as the actual buyer of the firearm, when in fact he well knew that he was buying the firearm for another person;

In violation of Title 18, United States Code, Section 924(a)(1)(A).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 7**

On or about May 31, 2018, in the Northern District of Indiana,  
**ROBERT PATRICK COLLINS,**  
defendant herein, in connection with the acquisition of a firearm, a Taurus model PT111G2 9mm firearm bearing serial number TLN32042, from South County Guns, a federally licensed firearms dealer, knowingly made a false and fictitious statement to South County Guns, which statement was intended and likely to deceive South County Guns as to a fact material to the lawfulness of such sale of the firearm to defendant ROBERT PATRICK COLLINS, in that defendant ROBERT PATRICK COLLINS did execute a U.S. Department of Justice, ATF Form 4473 Firearms Transaction Record, to the effect that defendant ROBERT PATRICK COLLINS represented himself as the actual purchaser of the firearm, whereas in truth and in fact, he well knew that he was buying said firearm for another person;

All in violation of Title 18, United States Code, Section 922(a)(6).



**THE GRAND JURY FURTHER CHARGES:**

**COUNT 8**

On or about May 31, 2018, in the Northern District of Indiana,  
**ROBERT PATRICK COLLINS,**  
defendant herein, knowingly made a false statement and representation to South County Guns, an entity licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of South County Guns, in that defendant ROBERT PATRICK COLLINS in connection with his acquisition of a firearm from South County Guns, did execute a U.S. Department of Justice, ATF Form 4473 Firearms Transaction Record, to the effect that defendant ROBERT PATRICK COLLINS represented himself as the actual buyer of the firearm, when in fact he well knew that he was buying the firearm for another person;

In violation of Title 18, United States Code, Section 924(a)(1)(A).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 9**

On or about June 27, 2018, in the Northern District of Indiana,  
**ROBERT PATRICK COLLINS,**  
defendant herein, in connection with the acquisition of a firearm, a Taurus model PT111G2 9mm firearm bearing serial number TLR59652, from South County Guns, a federally licensed firearms dealer, knowingly made a false and fictitious statement to South County Guns, which statement was intended and likely to deceive South County Guns as to a fact material to the lawfulness of such sale of the firearm to defendant ROBERT PATRICK COLLINS, in that defendant ROBERT PATRICK COLLINS did execute a U.S. Department of Justice, ATF Form 4473 Firearms Transaction Record, to the effect that defendant ROBERT PATRICK COLLINS represented himself as the actual purchaser of the firearm, whereas in truth and in fact, he well knew that he was buying said firearm for another person;

All in violation of Title 18, United States Code, Section 922(a)(6).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 10**

On or about June 27 2018, in the Northern District of Indiana,  
**ROBERT PATRICK COLLINS,**  
defendant herein, knowingly made a false statement and representation to South County Guns, an entity licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of South County Guns, in that defendant ROBERT PATRICK COLLINS in connection with his acquisition of a firearm from South County Guns, did execute a U.S. Department of Justice, ATF Form 4473 Firearms Transaction Record, to the effect that defendant ROBERT PATRICK COLLINS represented himself as the actual buyer of the firearm, when in fact he well knew that he was buying the firearm for another person;

In violation of Title 18, United States Code, Section 924(a)(1)(A).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 11**

On or about July 11, 2018, in the Northern District of Indiana,  
**ROBERT PATRICK COLLINS,**  
defendant herein, in connection with the acquisition of a firearm, a F.N. model 5-7 semi-automatic pistol bearing serial number 386340752, from Westforth Sports Inc., a federally licensed firearms dealer, knowingly made a false and fictitious statement to Westforth Sports Inc., which statement was intended and likely to deceive Westforth Sports Inc. as to a fact material to the lawfulness of such sale of the firearm to defendant ROBERT PATRICK COLLINS, in that defendant ROBERT PATRICK COLLINS did execute a U.S. Department of Justice, ATF Form 4473 Firearms Transaction Record, to the effect that defendant ROBERT PATRICK COLLINS represented himself as the actual purchaser of the firearm, whereas in truth and in fact, he well knew that he was buying said firearm for another person;

All in violation of Title 18, United States Code, Section 922(a)(6).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 12**

On or about July 11, 2018, in the Northern District of Indiana,  
**ROBERT PATRICK COLLINS,**  
defendant herein, knowingly made a false statement and representation to Westforth Sports Inc., an entity licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Westforth Sports Inc., in that defendant ROBERT PATRICK COLLINS in connection with his acquisition of a firearm from Westforth Sports Inc., did execute a U.S. Department of Justice, ATF Form 4473 Firearms Transaction Record, to the effect that defendant ROBERT PATRICK COLLINS represented himself as the actual buyer of the firearm, when in fact he well knew that he was buying the firearm for another person;

In violation of Title 18, United States Code, Section 924(a)(1)(A).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 13**

On or about August 8, 2018, in the Northern District of Indiana,  
**ROBERT PATRICK COLLINS,**  
defendant herein, in connection with the acquisition of a firearm, a Taurus model PT111G2 9mm firearm bearing serial number TKX44636, from South County Guns, a federally licensed firearms dealer, knowingly made a false and fictitious statement to South County Guns, which statement was intended and likely to deceive South County Guns as to a fact material to the lawfulness of such sale of the firearm to defendant ROBERT PATRICK COLLINS, in that defendant ROBERT PATRICK COLLINS did execute a U.S. Department of Justice, ATF Form 4473 Firearms Transaction Record, to the effect that defendant ROBERT PATRICK COLLINS represented himself as the actual purchaser of the firearm, whereas in truth and in fact, he well knew that he was buying said firearm for another person;

All in violation of Title 18, United States Code, Section 922(a)(6).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 14**

On or about August 8, 2018, in the Northern District of Indiana,

**ROBERT PATRICK COLLINS,**

defendant herein, knowingly made a false statement and representation to South County Guns, an entity licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of South County Guns, in that defendant ROBERT PATRICK COLLINS in connection with his acquisition of a firearm from South County Guns, did execute a U.S. Department of Justice, ATF Form 4473 Firearms Transaction Record, to the effect that defendant ROBERT PATRICK COLLINS represented himself as the actual buyer of the firearm, when in fact he well knew that he was buying the firearm for another person;

In violation of Title 18, United States Code, Section 924(a)(1)(A).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 15**

On or about August 8, 2018, in the Northern District of Indiana,  
**ROBERT PATRICK COLLINS,**  
defendant herein, in connection with the acquisition of a firearm, a Glock model 22 .40 caliber firearm bearing serial number DUA838US, from Cabela's, a federally licensed firearms dealer, knowingly made a false and fictitious statement to Cabela's, which statement was intended and likely to deceive Cabela's as to a fact material to the lawfulness of such sale of the firearm to defendant ROBERT PATRICK COLLINS, in that defendant ROBERT PATRICK COLLINS did execute a U.S. Department of Justice, ATF Form 4473 Firearms Transaction Record, to the effect that defendant ROBERT PATRICK COLLINS represented himself as the actual purchaser of the firearm, whereas in truth and in fact, he well knew that he was buying said firearm for another person;

All in violation of Title 18, United States Code, Section 922(a)(6).



**THE GRAND JURY FURTHER CHARGES:**

**COUNT 16**

On or about August 8, 2018, in the Northern District of Indiana,  
**ROBERT PATRICK COLLINS,**  
defendant herein, knowingly made a false statement and representation to Cabela's, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Cabela's, in that defendant ROBERT PATRICK COLLINS in connection with his acquisition of a firearm from Cabela's, did execute a U.S. Department of Justice, ATF Form 4473 Firearms Transaction Record, to the effect that defendant ROBERT PATRICK COLLINS represented himself as the actual buyer of the firearm, when in fact he well knew that he was buying the firearm for another person;

In violation of Title 18, United States Code, Section 924(a)(1)(A).

### **FORFEITURE ALLEGATION**

The allegations of Counts 1-16 of the Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18 United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

Upon conviction of the offenses alleged in any of Counts 1-16 in this Indictment, ROBERT PATRICK COLLINS shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any and all firearms and ammunition involved in the commission of the offenses, including but not limited to:

- 1) One (1) Smith & Wesson model SD40VE .40 caliber firearm bearing serial number FZS2762;
- 2) One (1) Taurus model PT111G2 9mm firearm bearing serial number TLN26405;
- 3) One (1) Taurus model PT111G2 9mm firearm bearing serial number TLN32021;
- 4) One (1) Taurus model PT111G2 9mm firearm bearing serial number TLN32042;
- 5) One (1) Taurus model PT111G2 9mm firearm bearing serial number TLR59652;
- 6) One (1) F.N. model 5-7 semi-automatic pistol bearing serial number 386340752; and
- 7/ One (1) Taurus model TP111G2 9mm bearing serial number TKX44636; and

- 8) One (1) Glock model 22 .40 caliber firearm bearing serial number DUA838US.

A TRUE BILL:

S/FOREPERSON  
FOREPERSON

THOMAS L. KIRSCH II  
UNITED STATES ATTORNEY

By: S/Jennifer Chang  
Jennifer Chang  
Assistant United States Attorney